

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

THE CITY OF HUNTINGTON,

Plaintiff,

v. CIVIL ACTION NO. 3:17-01362

AMERISOURCEBERGEN DRUG

CORPORATION, et al,

Defendants.

CABELL COUNTY COMMISSION,

Plaintiff,

vs.

AMERISOURCEBERGEN DRUG

CORPORATION, et al,

Defendants.

Videotaped and videoconference deposition of
KELLI SOBONYA, taken by the Defendants pursuant to the
West Virginia Federal Rules of Civil Procedure, in the
above-entitled action, pursuant to notice, before Twyla
Donathan, Registered Professional Reporter and Notary
Public, at the Mountain Health Arena, ONE CIVIC CENTER
PLAZA, HUNTINGTON, WEST VIRGINIA, on the 10th
day of July, 2020.

1 her this year -- I had two back surgeries, and even though
2 the doctor wanted to write me a prescription, I refused
3 because of my experience.

4 Q So you refused prescriptions for opioids when
5 they've been offered to you?

6 A Since this opioid epidemic started, I have
7 refused -- To my knowledge, I mean, I can't tell you -- I
8 can't tell you with -- unequivocally without a doubt that
9 I ever was prescribed an opioid and took one. It's my
10 recollection that I did not. I know from my two back
11 surgeries, I declined the offer for a prescription post
12 release.

13 Q Were those recent?

14 A This surgery to repair three ruptured disks was
15 probably seven years -- six or seven years ago, maybe
16 longer, maybe ten years. And my lower back, I had my
17 surgery to repair a ruptured disc, I would say a year and
18 a half to two years ago.

19 Q And you have already mentioned that you have had
20 some family members who have had adverse experience with
21 opioids?

22 A Yes, my cousin Rachel lived in Huntington. She
23 was prescribed opioids due to a workplace injury. She got
24 hooked on those, and she has since -- we buried her this

1 year. She left behind a 14-year-old son.

2 My nephew, who was a football player in Wayne
3 County, was prescribed opioids for a shoulder injury. And
4 he is still in the throes of addiction, in and out of
5 some -- you know, multiple arrests. And he's still
6 addicted.

7 I have multiple friends, you know, who've lost
8 children and now they're raising their grandchildren.
9 I've had experience with friends who, to the shock of the
10 family members, the baby was born drug exposed and placed
11 into Lilly's Place for care. And since then, there's been
12 suicide.

13 And my friend is -- I have multiple friends that
14 are raising their grandchildren, who are older than me,
15 because they've lost children to the opioid addiction
16 problem from overdoses or from subsequent suicide.

17 And I can attest to the fact that the children
18 born exposed to opioids are continuing to have problems.
19 One of my good friends is raising her five-year-old
20 grandchild, and she wears diapers and cannot effectively
21 communicate. My other friend who is raising her grandson
22 who is four years old who was put into Lilly's Place, he
23 had -- like I said, the mother committed suicide because
24 she got back into opioids and addiction. And her fiance

1 jumped off the Ohio River bridge here in Huntington. He
2 survived, and he is back living with his mother, and she
3 is raising -- helping to raise his son who has severe
4 problems. He is going through therapy -- it's behavioral,
5 because of his exposure to opioids while in the womb.

6 And it's an ongoing process. They actually --
7 they lived in a townhouse community, you know, getting --
8 gearing up for their retirement, and they now have had to
9 build another house to accommodate their grandson living
10 with them.

11 I had a friend who -- she came to me because her
12 granddaughter was killed by someone who ran the flashing
13 lights of a school bus that had stopped, and her
14 granddaughter who was six had died. And so we passed
15 Haven's Law, and I got to know her through that effort.
16 And I got the call from her that her daughter, who was
17 waiting for a treatment bed -- she was addicted to opioids
18 for a number of years, and I got the call of her screaming
19 and saying that her daughter, waiting for a treatment bed,
20 used again and she died of an overdose. And now my
21 friend, who is probably ten years older than me, is
22 raising her three granddaughters left behind. The
23 youngest was a year old when her mother overdosed.

24 I mean, I could just -- I could go story after

1 story. I mean, I've known so much pain from this opioid
2 addiction. As a policymaker, I'm part of -- When I was in
3 the legislature -- I'm sorry. I'm getting emotional
4 because I know the effects of what the opioids have done
5 to my friends and their families, but --

6 Can I get my thoughts?

7 MS. KNIGHT: Yes, ma'am. Take a break.

8 MR. RUBY: Sure. Take a break.

9 VIDEOGRAPHER: Going off the record. The
10 time is 4:40 p.m.

11 (A recess was taken.)

12 VIDEOGRAPHER: We're back on the record.
13 The time is 4:48 p.m. This begins Unit No. 4 in the
14 deposition of Kelli Sobonya.

15 THE DEPONENT: I think I was in the middle
16 of a sentence where I was talking about -- You know, as a
17 policymaker, our women's caucus toured the NIC unit in
18 Charleston at the hospital, and one of the things we were
19 focusing on in our meetings as a women's caucus was the
20 opioid epidemic and the effect on women and children and
21 families throughout the state, because we all represented
22 different parts of the state.

23 And so we went and met with the doctor who
24 was in charge of the NICU Unit, and more importantly the